## Message

From: Pankratz, Shannon L CIV USARMY CESPL (US) [Shannon.L.Pankratz@usace.army.mil]

**Sent**: 6/18/2018 3:24:43 PM

To: Mahdavi, Sarvy [Mahdavi.Sarvy@epa.gov]

Subject: RE: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO:

1600-2015-0075-R5

Hi Sarvy!

As long as everything looks fine to you, all we would need is an email from EPA (as an IRT member) supporting the 2nd release of credits.

I need to briefly talk with Warren, but I think all of our earlier issues (i.e. having the request of credits matching the BEI figures) have been resolved.

Thanks!

Shannon Pankratz
Senior Project Manager, Biologist
Regulatory Division, North Coast Branch, Los Angeles and San Bernardino Counties Section
Los Angeles District, U.S. Army Corps of Engineers
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----Original Message----

From: Mahdavi, Sarvy [mailto:Mahdavi.Sarvy@epa.gov]

Sent: Thursday, June 14, 2018 11:24 AM

To: Pankratz, Shannon L'CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil>

Subject: [Non-DoD Source] FW: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5]

Hi Shannon, what is your next step on this? And what do you need from us (me)? Thanks! Sarvy

From: Nate Bello [mailto:bello@wra-ca.com]
Sent: Wednesday, June 06, 2018 2:02 PM
To: Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov>
Cc: Zimmerman, Jan@waterboards <jan.zimmerman@waterboards.ca.gov>; Wong, Warren@wildlife
<Warren.Wong@wildlife.ca.gov>; Andrew Cawley <cawley@wra-ca.com>; Tracey Brownfield
<tracey@landveritas.com>; Pankratz, Shannon L SPL <Shannon.L.Pankratz@usace.army.mil>
Subject: Re: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW
TRACKING NO: 1600-2015-0075-R5]

Dear IRT,

Please find attached the resubmitted letter requesting the 2nd credit release from Areas A and E of the Petersen Ranch Mitigation Bank. We have revised the letter according to your previous feedback with the credit release now matching what was presented in the BEI, and a new Table 10 to help explain the endowment funding.

If you have any additional questions or comments please do not hesitate to contact me.

Thank you,

Nate

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Nathan Bello | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c:
916.508.4993 | bello@wra-ca.com <mailto:bello@wra-ca.com>
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On Fri, May 25, 2018 at 11:17 AM, Nate Bello <bello@wra-ca.com <mailto:bello@wra-ca.com> > wrote:

Dear IRT.

Thank you all for the review and the feedback, and I apologize for causing confusion. We followed the credit adjustment methodology we were directed to use for the Soquel Canyon Mitigation Bank following the as-builts, but the sponsor is happy to simplify and just go with the number of credits from the original PRMB banking documents. We will revise and resubmit along with an explanation of the endowment funding to-date.

Thanks all for your work on the project,

Nate

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Nathan Bello | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c:
916.508.4993 | bello@wra-ca.com <mailto:bello@wra-ca.com>
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On Tue, May 22, 2018 at 2:52 PM, Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov <mailto:Mahdavi.Sarvy@epa.gov> > wrote:

Nate.

I concur; the revised totals and adjustments confused me.

EPA recommends that no adjustments on credits be made based on As-Builts; only after year 5, when a wetlands delineation can confirm final acres, should we then discuss how to properly adjust for extra credits.

> Thanks, Sarvy

From: Zimmerman, Jan@Waterboards [mailto:jan.zimmerman@waterboards.ca.gov

<mailto:jan.zimmerman@waterboards.ca.gov> ]

Sent: Monday, May 21, 2018 6:03 PM

To: Wong, Warren@wildlife <warren.Wong@wildlife.ca.gov <mailto:Warren.Wong@wildlife.ca.gov> >; Nate Bello <bello@wra-ca.com <mailto:bello@wra-ca.com> >; Andrew Cawley <cawley@wra-ca.com 

<mailto:Shannon.L.Pankratz@usace.army.mil> >; Mahdavi, Sarvy <Mahdavi.Sarvy@epa.gov <mailto:Mahdavi.Sarvy@epa.gov> >

Subject: RE: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5]

I too was confused regarding the revised totals and release adjustment columns. An explanation would be appreciated.

Thanks! Jan

From: Wong, Warren@Wildlife [mailto:Warren.Wong@wildlife.ca.gov]

Sent: Monday, May 21, 2018 2:28 PM
To: Nate Bello <bello@wra-ca.com <mailto:bello@wra-ca.com >>; Andrew Cawley <cawley@wraca.com <mailto:cawley@wra-ca.com> >; Tracey Brownfield <tracey@landveritas.com <mailto:tracey@landveritas.com> >

Cc: Zimmerman, Jan@Waterboards < jan.zimmerman@waterboards.ca.gov

<mailto:jan.zimmerman@waterboards.ca.gov> >; Pankratz, Shannon L SPL <Shannon.L.Pankratz@usace.army.mil</pre> <mailto:Shannon.L.Pankratz@usace.army.mil> >; Sarvy Mahdavi <Mahdavi.Sarvy@epa.gov</pre> <mailto:Mahdavi.Sarvy@epa.gov> >

Subject: RE: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5]

Hi Nate,

Thank you for the nudge! I looked over the 2nd release request and was having trouble following the credit calculations involved. I spoke with Shannon and we think the Revised Totals and Release Adjustments columns need to be removed. This second release should be 25% of what was agreed upon (by agency/credit type) in the BEI/Development Plan. If those release amounts/numbers are to be changed now, we would likely need to amend the BEI.

Also, if you can give a brief summary of how the 15% endowment amount was calculated, that will help my (aging/feeble) memory.

With those columns out and the endowment calc clarified, I should be able to get the DFW letter out quickly.

Please give me a call if you have questions. I'll be out starting Wednesday, but will be back next Tuesday.

Warren

Warren Wong

Senior Environmental Scientist - Specialist

South Coast Region Banking Coordinator

California Department of Fish and Wildlife

3883 Ruffin Road

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San Diego, California 92123

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(858) 627-3997

From: Nate Bello <bello@wra-ca.com <mailto:bello@wra-ca.com> > Sent: Friday, May 11, 2018 2:18 PM To: Andrew Cawley <cawley@wra-ca.com <mailto:cawley@wra-ca.com> >; Tracey Brownfield <tracey@landveritas.com <mailto:tracey@landveritas.com> > Cc: Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov mailto:jan.zimmerman@waterboards.ca.gov> >; Pānkratz, Shannon L SPL <Shannon.L.Pankratz@usace.army.mil <mailto:Shannon.L.Pankratz@usace.army.mil> >; Wong, Warren@Wildlife <Warren.Wong@wildlife.ca.gov
<mailto:Warren.Wong@wildlife.ca.gov> >; Sarvy Mahdavi <Mahdavi.Sarvy@epa.gov</pre> <mailto:Mahdavi.Sarvy@epa.gov> > Subject: Re: Petersen Ranch Mitigation Bank 2nd Credit Release [USACE FILE NO: SPL-2012-00669-BEM, CDFW TRACKING NO: 1600-2015-0075-R5] Hello IRT, Shannon, Warren and Sarvy I know you have all told me that you are incredibly busy right now, Jan I imagine you are in the same boat as well. So this is just a friendly nudge to remind you of our outstanding request for approval of the 2nd credit release from Petersen Ranch. We would like to get this approved within the next few weeks if possible, let me know if there is anything I can do to help. Thanks and have a great weekend all, Nate Nathan Bello | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | bello@wra-ca.com <mailto:bello@wra-ca.com> WRA, Inc. | Blockedwww.wra-ca.com <Blockedhttp://www.wra-ca.com/> | 2169-G <Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+ 94901&entry=gmail&source=g> East Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+ 94901&entry=gmail&source=g> Francisco <Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8Csan+Rafael,+CA+ 94901&entry=gmail&source=g> Blvd., San <Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+ 94901&entry=gmail&source=g> Rafael, <Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+</p> 94901&entry=gmail&source=g> CA Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+ 94901&entry=gmail&source=g> 94901 Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+ 94901&entry=gmail&source=g> | San Diego | Fort Bragg | Denver wrote: Hello IRT,

I wanted to follow up on this request for the 2nd credit release at the Petersen Ranch M.B. We are talking to a permittee who needs a large amount of 404 credits very soon that I think will require the second credit release to move forward. When you have a moment could you let me know an ETA for approval or if you need any additional information from us?

Thanks all,

Nate

Nathan Bello | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | bello@wra-ca.com <mailto:bello@wra-ca.com> WRA, Inc. | Blockedwww.wra-ca.com <Blockedhttp://www.wra-ca.com/> | 2169-G <Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+ 94901&entry=gmail&source=g> East <Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+ 94901&entry=gmail&source=g> Francisco Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+ 94901&entry=gmail&source=g> Blvd., San <Blockedhttps://maps.google.com/?g=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8Csan+Rafael,+CA+</p> 94901&entry=gmail&source=g> Rafael, <Blockedhttps://maps.google.com/?g=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+</p> 94901&entry=gmail&source=g> CA <Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+ 94901&entry=gmail&source=g> 94901 <Blockedhttps://maps.google.com/?q=2169%E2%80%91G+East+Francisco+Blvd.,%E2%80%8C+%E2%80%8CSan+Rafael,+CA+</pre> 94901&entry=gmail&source=g> | San Diego | Fort Bragg | Denver On Wed, Apr 11, 2018 at 4:45 PM, Andrew Cawley <cawley@wra-ca.com <mailto:cawley@wra-ca.com> > wrote: Dear IRT, Nate Bello requested that I forward the revised 2nd credit release request for Areas A and E of Petersen Ranch Mitigation Bank. It has been edited to include language requesting Water Board authorization to release Porter Cologne credits as well. Please find the letter attached to this email. As Nate mentioned in his previous email, the endowment has been funded according to our previous discussions and the ledgers in the letter include adjustments to account for as-built conditions as approved by the IRT in 2016 and 2017. Please let us know if you have any additional questions. Thank you On Mon, Apr 9, 2018 at 4:21 PM, Nate Bello <bello@wra-ca.com <mailto:bello@wra-ca.com> > wrote: Thank you Jan. The intent is to ask for the Regional Board approval of the 2nd release as well. Sorry for the omission, we will revise and resend. Thank you, Nate Nathan Bello | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | bello@wra-ca.com <mailto:bello@wra-ca.com> WRA, Inc. | Blockedwww.wra-ca.com <Blockedhttp://www.wra-ca.com/> | 2169-G East Francisco Blvd., San Rafael, CA 94901 <Blockedhttps://maps.google.com/?q=2169%E2%80%91G%C2%A0East%C2%A0Francisco%C2%A0Blvd.,%E2%80%8C+%E2%80%8C</p> San%C2%A0Rafael,%C2%A0CA%C2%A094901&entry=gmail&source=g> | San Diego | Fort Bragg | Denver

On Mon, Apr 9, 2018 at 4:04 PM, Zimmerman, Jan@Waterboards <jan.zimmerman@waterboards.ca.gov <mailto:jan.zimmerman@waterboards.ca.gov> > wrote:

Nate, the letter does not request Water Board authorization for the second credit release, yet it includes additional Porter-Cologne credits in Table 8 and Table 9. Please clarify whether Porter-Cologne credits are being requested. If so, revise the language in the request letter to indicate that is the purpose; if not, then remove the additional 25% of total available Porter-Cologne credits from the credit release tables (Table 8 and Table 9). The Porter-Cologne credit release schedule is to follow BEI section VII.B.1.b. Thank you.

Jan Zimmerman, P.G. #8392
Senior Engineering Geologist
Lahontan Regional Water Quality Control Board
760/241-7376

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Dear IRT,

Please find enclosed the 2nd credit release request for Area's A and E of the Petersen Ranch Mitigation Bank. The Sponsor has funded the endowment according to our previous discussions and the ledgers in this letter include adjustments to account for as-built conditions as approved by the IRT in 2016 and 2017. Please let me know if you have any questions, or if there is any other information I can provide to assist you in your review and approval of the 2nd credit release.

Thank you,

Nate

Nathan Bello | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | bello@wra-ca.com <mailto:bello@wra-ca.com>

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l,+CA+94901&entry=gmail&source=g> | Emeryville | San Diego | Fort Bragg | Denver